

STATE OF CALIFORNIA
Budget Change Proposal - Cover Sheet
DF-46 (REV 08/17)

Fiscal Year 2019-20	Business Unit 5225	Department California Department of Corrections and Rehabilitation	Priority No.
Budget Request Name Tattoo Removal Program		Program 4550 - Adult Corrections and Rehabilitation Operations - Institution Administration 4530 - Adult Corrections and Rehabilitation operations - General Security	Subprogram 45300280 - General Security Overtime 4550051 - Division of Adult Institutions

Budget Request Description
Tattoo Removal Program

Budget Request Summary

The California Department of Corrections and Rehabilitation, Division of Adult Institutions, requests a reduction of \$1,400,000 General Fund in 2019-20 and \$369,000 General Fund in 2020-21, 2021-22 and 2022-23 to revise the level of funding for the inmate tattoo removal program included in the Governor's Budget. This results in total funding of \$1.1 million and 1.0 position in 2019-20, and \$2.1 million and 1.0 position in 2020-21, 2021-22 and 2022-23, General Fund for the tattoo removal program.

Requires Legislation <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Code Section(s) to be Added/Amended/Repealed	
Does this BCP contain information technology (IT) components? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If yes, departmental Chief Information Officer must sign.</i>	Department CIO	Date

For IT requests, specify the project number, the most recent project approval document (FSR, SPR, S1BA, S2AA, S3SD, S4PRA), and the approval date.

Project No. Project Approval Document: Approval Date:

If proposal affects another department, does other department concur with proposal? ☐ Yes ☐ No
Attach comments of affected department, signed and dated by the department director or designee.

Prepared By Kristin Drummond	Date	Reviewed By David Baughman	Date
Department Director Connie Gipson	Date	Agency Secretary Ralph Diaz	Date

Department of Finance Use Only

Additional Review: ☐ Capital Outlay ☐ ITCU ☐ FSCU ☐ OSAE ☐ CALSTARS ☐ Dept. of Technology

BCP Type: ☐ Policy ☐ Workload Budget per Government Code 13308.05

PPBA	Original Signed By: Madelynn McClain	Date submitted to the Legislature 5/9/19
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Department of Finance
2019-20
Finance Letter Worksheet

5225 001 0001 2019

DEPT: Department of Corrections and
Rehabilitation
STATE OPERATIONS

Prop 98: N

5225-423-BCP-2019-MR

Tattoo Removal Program

Proposal Summary

Adjustment to reflect revised costs to support a new Tattoo Removal Program.

Category Changes	Positions	Whole Dollars
Salaries and Wages	0.0	152,000
Staff Benefits	0.0	31,000
Operating Expenses and Equipment	0.0	-1,583,000
Total Category Changes	0.0	\$-1,400,000
Program Changes		
4530 Adult Corrections and Rehabilitation Operations-General Security	0.0	92,000
4550 Adult Corrections and Rehabilitation Operations-Institution Administration	0.0	-1,492,000
Total Program Changes	0.0	\$-1,400,000
Fund Changes		
Amount Funded by 5225 001 0001 2019	0.0	-1,400,000
Net Impact to Item	0.0	\$-1,400,000

DOF ANALYST: Michael Fleischmann
ASM CONSULTANT: JK
SEN CONSULTANT: CF
LAO CONTACT: AS/DS
VERSION: MR Working
RUN DATE: May 07, 2019 04:06 PM

Analysis of Problem

A. Budget Request Summary

The California Department of Corrections and Rehabilitation, Division of Adult Institutions, requests a reduction of \$1,400,000 General Fund in 2019-20 and \$369,000 General Fund in 2020-21, 2021-22 and 2022-23 to revise the level of funding for the inmate tattoo removal program included in the Governor's Budget. This results in total funding of \$1.1 million and 1.0 position in 2019-20, and \$2.1 million and 1.0 position in 2020-21, 2021-22 and 2022-23, General Fund for the tattoo removal program.

B. Background/History

CDCR enhances public safety through the safe and secure incarceration of offenders while implementing rehabilitative strategies to successfully reintegrate offenders into California communities. As part of this mission, CDCR provides offenders and parolees the opportunity to disassociate themselves from criminal lifestyles, including gangs. CDCR provides programming opportunities for offenders to learn how to accept responsibility for their pasts and learn general education, vocational, and life skills for their futures to improve their chances of becoming productive members of society upon release.

Many offenders become gang members when they are young and are often forced to obtain gang-related tattoos on highly visible areas such as on the face, neck, and hands to show their commitment to the gang. Offenders are often further encouraged to obtain highly visible tattoos while incarcerated as tattoos may signify prison social hierarchy, especially within gangs. Because these highly visible tattoos are signifiers of gang involvement or criminal history, they can interfere with an offender's rehabilitative efforts. For example, once an offender who completely disassociated from a gang is released back onto a General Population yard, the offender is placed at risk for a violent attack due to their official renouncement of the gang, yet continued visible platform of tattoos signifying hierarchy and membership.

These tattoos can also interfere with rehabilitative efforts once an offender is released from prison. Highly visible gang or otherwise offensive tattoos can be perceived by community members as active gang participation or as a general threat to society. This can limit former offenders' ability to build healthy connections with their families and communities despite their rehabilitation. Examples of gang-related or other visible tattoos can be seen in Attachment A.

In recognition of the barriers faced by offenders with visible tattoos, in 2018-19 CDCR implemented a tattoo removal service contract with funding from the California Prison Industry Authority (CalPIA) to provide tattoo removal services at the Folsom Women's Facility (FWF) and the Sacramento-based Custody to Community Transition Reentry Program (CCTRP) facility. Participating offenders have received five treatments to date, which have already greatly reduced the visibility of offensive tattoos on FWF and CCTRP offenders (Attachment B).

Under the current contract, the service provider brings tattoo removal equipment to the facility in a large shuttle-style van, which operates as a fully self-contained mobile service unit. Because the tattoo removal service unit is self-contained and mobile, it can treat multiple offenders onsite (as opposed to escorting and guarding offenders at a separate business location). Between two and four offenders are escorted to the van, where they watch a video tutorial about the process. They are then treated one at a time in a privately partitioned section of the van, with each treatment lasting only a few minutes. The offender then exits the van and is escorted back to their housing unit.

Analysis of Problem

C. State Level Considerations

This proposal is consistent with CDCR's mission of enhancing public safety by implementing rehabilitative strategies to successfully reintegrate offenders into California communities. Also, it is consistent with CDCR's Blueprint, as this program will accomplish the goals of improving access to rehabilitative programming based off identified offender needs, as well as implementing recommendations for gang and criminal activity management.

D. Justification

One continued barrier preventing successful re-entry of offenders into California communities is the ability of ex-offenders to gain employment upon release. Many corporations and businesses in California communities do not allow visible tattoos, and those businesses that do allow visible tattoos, do not allow them to be gang-related or otherwise offensive. As a result, tattoo removal has become noted as a missing piece in the re-entry puzzle by Robert Hood, one of the nation's reputable corrections professionals and long-time national security specialist. Hood further asserts that assisting offenders in gaining employment is a key element of successful re-entry into communities (Attachment C). Combining CDCR's education-based rehabilitative programs with tattoo removal will increase opportunities for ex-offenders to gain lawful employment, aid in their acceptance from their own community members, and provide a greater chance of success as productive members of society.

Recent studies conducted in regards to visible tattoos in the workplace continually find there still exists stigma related to tattoos, which damages employment opportunities. For instance, one study stated 37 percent of approximately 3,000 human resources managers cite tattoos as having a negative impact on hiring decisions and list tattoos as a physical attribute which limits career potential. Approximately 42 percent of people of all ages perceive tattoos as inappropriate at work – this includes 63 percent of people aged 60 years and older, which is an age range of community members who are often in management or business ownership positions, and those who are 40 and over who are often the largest paying customer base (See Attachment C - Hartwell-Walker, 2018; McMullen, 2015).

Given the potential post-release employment benefits, along with the significant interest and participation of the existing program, CDCR surveyed participants in the gang debriefing process (a formal, multi-step gang disassociation process) to assess whether there was interest in a tattoo removal program. The survey found that 91 percent of Debrief Processing Unit offenders (who are in the process of debriefing) and 39 percent of Transitional Housing Unit offenders (who have completed the gang debriefing process) were interested in participating in a tattoo removal program. Given these results, CDCR expects that the majority of offenders involved in the debriefing process would benefit from the program. This data also indicates many offenders who have previously debriefed, as well as other offenders who have distanced themselves from gangs informally, would benefit from this proposal.

The current tattoo removal contract is funded by CalPIA, and cannot be expanded without additional resources. Based on current contract rates and the estimated number of eligible participants, CDCR developed a plan to expand services statewide. CDCR is proposing to offer tattoo removal services to offenders who are nearing release to the community, as well as offenders who have completed the debriefing process. According to the Strategic Offenders Management System (SOMS), roughly 15 percent of offenders currently have highly visible tattoos. Based on the number of offenders with highly visible tattoos who are nearing release or who have participated in the debriefing process, CDCR estimates that 3,032 offenders could receive treatment each fiscal year. The anticipated tattoo removal contract allows six treatments annually, with each treatment costing approximately \$94 per offender, or roughly \$564 to treat each offender per year. The number of treatments necessary for successful removal will vary due to the quality of ink. Therefore, offenders will receive the appropriate amount of treatments as determined by the contracted Registered Nurse.

Analysis of Problem

Expanding the program also requires additional administrative staff and funding for custody overtime. CDCR is requesting 1.0 Staff Services Manager I (Specialist) (SSMI) to provide contract oversight, develop and oversee the expansion of the program, and to track and report data. CDCR will also need Correctional Officer (CO) overtime hours to escort inmates and provide supervision during tattoo removal services. The SSMI (Specialist) would track all resources allotted to the program and complete an evaluation of the provided services (see Attachment D for details)

Given that a statewide tattoo removal program will require some time to establish, CDCR is proposing a phased approach to implement the tattoo removal program and ensure its success. The first six months of 2019-20 will be used to hire the SSMI (Specialist), complete the contract process, and coordinate services with the 21 proposed institutions. Beginning January 2020, tattoo removal services will begin with three treatments for inmates at the 21 proposed institutions. In Fiscal Year 2020-21, six treatments will be provided annually for the remainder of the contract for the next three years (2020-21, 2021-22, and 2022-23). The table below summarizes the fiscal year requests and associated costs:

Fiscal Year	Institutions	Start	Treatments	Inmates Served	Contract	OT	SSMI	Total Cost
2019-20	Complete contract and hiring process	Jul 2019-Dec 2019	0					
	Begin treatment at 21 institutions	Jan 2020-Jun 2020	3	3,032	\$910k	\$92k	\$96k	\$1.1M
2020-21	Continue treatment at 21 institutions	Jul 2020-Jun 2021	6	3,032	\$1.8M	\$184k	\$129k	\$2.1M
2021-22	Continue treatment at 21 institutions	Jul 2021-Jun 2022	6	3,032	\$1.8M	\$184k	\$129k	\$2.1M
	Complete evaluation of prior 24 months of service	Jan 2022-Jun 2022	0					
2022-23	Continue treatment at 21 institutions	Jul 2022-Jun 2023	6	3,032	\$1.8M	\$184k	\$129k	\$2.1M

E. Outcomes and Accountability

Captains at each institution will serve as the local Tattoo Removal Program Coordinators. The Coordinators will ensure offenders interested in the program meet the criteria and are scheduled treatment appointments with the approved contractor. Correctional Officers at each institution will escort offenders to the appointment. The contractor will be required to take “before” photos, and institutional staff will take “after” photos for updated inmate identification cards. In addition, a survey or quality control form will be required to document each offender undergoing the tattoo removal treatments to ensure tattoo removal services are successful, safe, and compliant.

CDCR will also track ongoing program data statewide, including how many offenders were treated, how many tattoos were treated (some offenders have more than one highly visible tattoo), how much overtime was utilized, how many offenders successfully completed treatment, the average number of treatments required per offender, and how many treated offenders were released. In addition, the SSMI (Specialist) will track offender interest and/or waitlists at institutions statewide to determine if resources may need to be realigned in order to meet institution-specific demand and ensure resources are appropriately and efficiently utilized.

Analysis of Problem

During, the third year of the program, 2021-22, CDCR will review the ongoing program data as described above in order to complete an evaluation of the program success and effectiveness. Based on the metric-tracked success and effectiveness of the program, CDCR may request additional ongoing funding in order to expand the Tattoo Removal Program to the remaining adult institutions, and possibly include additional facilities such as community re-entry facilities, so a percentage of offenders scheduled for release statewide may have the opportunity to participate in the program.

F. Analysis of All Feasible Alternatives

Alternative 1: Provide \$1.1 million and 1.0 position in 2019-20, and \$2.1 million and 1.0 position in 2020-21, 2021-22 and 2022-23, General Fund, to implement a Tattoo Removal Program.

Pros:

- CDCR will provide for the removal of tattoos to approximately 3,032 inmates per year.
- CDCR will provide a new effective rehabilitative strategy to further suppress criminal behavior and mentality both inside and outside of prison, including severing gang ties and decreasing gang activity.
- Potential reduction of violent altercations due to decreased gang membership and decreased visibility of gang affiliation in visible tattoos, thereby increasing institutional staff and offender safety and increasing chances of employment and successful reintegration.
- Provides a short-term solution in assisting offenders who renounce dangerous prison culture behaviors and mentality, including gang affiliations, by removing highly visible tattoos, thereby increasing paroled offender acceptance into their communities
- Allows CDCR to compile metrics over a significant period of time in order to complete a metric-based evaluation component to determine program success and effectiveness.

Cons:

- Additional General Fund resources.

Alternative 2: Provide \$1.1 million and 1.0 position in 2019-20, and \$2.1 million and 1.0 position in 2020-21 and 2021-22, General Fund, to implement a Tattoo Removal Program over the course of three years.

Pros:

- CDCR will provide for the removal of tattoos for approximately 3,032 inmates per year for three years.
- CDCR will provide a new effective rehabilitative strategy to further suppress criminal behavior and mentality both inside and outside of prison, including severing gang ties and decreasing gang activity.
- Potential reduction of violent altercations in due to decreased gang membership and decreased visibility of gang affiliation in visible tattoos, thereby increasing institutional staff and offender safety and increasing chances of employment and successful reintegration.
- Provides a short-term solution in assisting offenders who renounce dangerous prison culture behaviors and mentality, including gang affiliations, by removing highly visible tattoos, thereby increasing paroled offender acceptance into their communities.

Analysis of Problem

- Allows CDCR to compile metrics over a significant period of time in order to complete a metric-based evaluation component to determine program success and effectiveness.

Cons:

- CDCR will not be able to complete a full evaluation of the program success and submit a request for additional funding if the program is successful *before* services cease.
- Additional General Fund resources.

Alternative 3: Provide \$1.1 million and 1.0 position in 2019-20, and \$2.1 million and 1.0 position in 2020-21, General Fund, to implement a Tattoo Removal Program over the course of two years.

Pros:

- CDCR will provide for the removal of tattoos for approximately 3,032 inmates per year.
- CDCR will provide a new effective rehabilitative strategy to further suppress criminal behavior and mentality both inside and outside of prison, including severing gang ties and decreasing gang activity.
- Potential reduction of violent altercations in due to decreased gang membership and decreased visibility of gang affiliation in visible tattoos, thereby increasing institutional staff and offender safety and increasing chances of employment and successful reintegration.
- Provides a short-term solution in assisting offenders who renounce dangerous prison culture behaviors and mentality, including gang affiliations, by removing highly visible tattoos, thereby increasing paroled offender acceptance into their communities.

Cons:

- CDCR will not be able to compile a comprehensive report of data to complete a full evaluation of the program success because the timeline and amount of offenders treated will be shortened.
- Additional General Fund resources.

G. Implementation Plan

Upon approval of funding, CDCR will advertise for the SSMI (Specialist), and recruit and hire the position. Simultaneously, CDCR will develop a Scope of Work and post a bid solicitation for mobile tattoo removal services and prepare to execute a contract. Additionally, CDCR will coordinate implementation plans with the proposed institutions, develop offender eligibility criteria, and draft an operational procedure to safely provide tattoo removal services. Once the SSMI (Specialist) is hired, a contract is executed, and operational procedures are approved, tattoo removal services will be provided.

During the third year of the program CDCR will complete an evaluation of the program success and effectiveness. Based on the outcomes of the evaluation, CDCR may request additional ongoing resources to modify or expand the program.

Analysis of Problem

H. Supplemental Information (*Describe special resources and provide details to support costs including appropriate back up.*)

Attachment A - Example of Targeted Offensive Tattoos

Attachment B - Example of Currently Treated Female Offender Tattoos

Attachment C - Works Cited

Attachment D - Inmate Tattoo Removal Costing Document

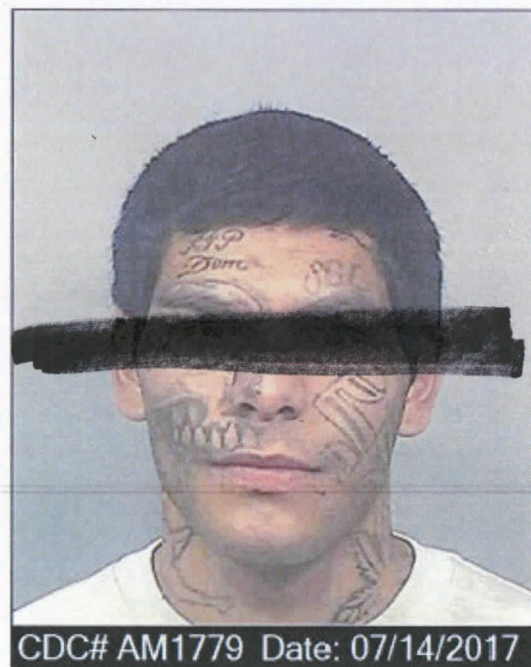
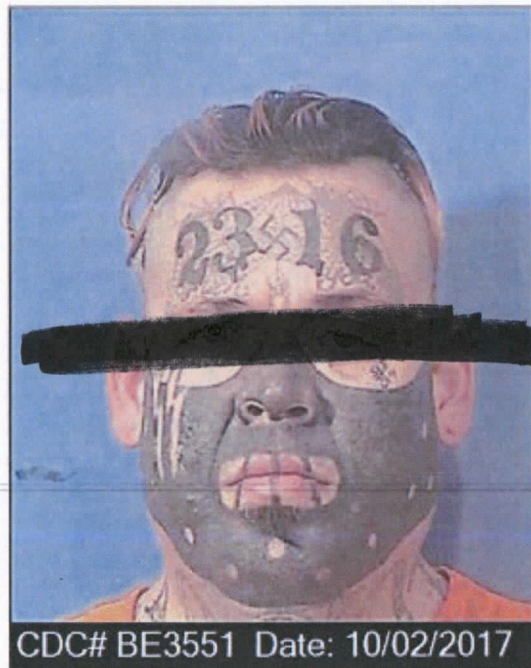
I. Recommendation

Alternative 1

Provide \$1.1 million and 1.0 position in 2019-20, and \$2.1 million and 1.0 position in 2020-21, 2021-22 and 2022-23, General Fund, to implement a Tattoo Removal.

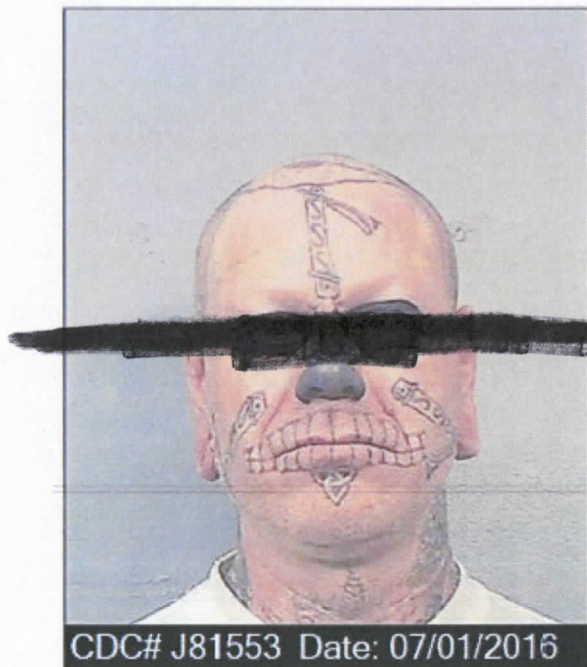
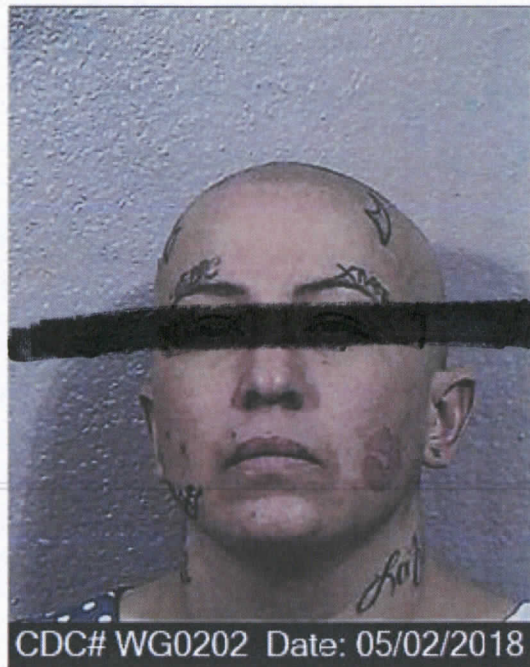
California Department of Corrections and Rehabilitation
Budget Change Proposal – Tattoo Removal Program
Example of Targeted Offensive Tattoos

Attachment A



California Department of Corrections and Rehabilitation
Budget Change Proposal – Tattoo Removal Program
Example of Targeted Offensive Tattoos

Attachment A



California Department of Corrections and Rehabilitation
Budget Change Proposal – Tattoo Removal Program
Example of Currently Treated Female Offender Tattoos

Attachment B



Budget Change Proposal – Tattoo Removal Program

Works Cited

1. Hartwell-Walker, Marie. "Thinking of Inking? The Possible Impact of Tattoos on Your Job Search." *Psych Central*, 8 October 2018, <https://psychcentral.com/lib/thinking-of-inking-the-possible-impact-of-tattoos-on-your-job-search/>.
2. Hood, Robert. "How tattoo removal can change the face of corrections." *Corrections One*, 2017, <https://www.correctionsone.com/re-entry-and-recidivism/articles/337274187-How-tattoo-removal-can-change-the-face-of-corrections/>.
3. McMullen, Laura. "Do You Still Need to Hide Your Tattoos and Piercings for Interviews?" *U.S. News*, 18 May 2015, <https://money.usnews.com/money/careers/articles/2015/05/18/do-you-still-need-to-hide-your-tattoos-and-piercings-for-interviews>.

California Department of Corrections and Rehabilitation
Budget Change Proposal - Tattoo Removal Program
Tattoo Removal Program Estimated Costing

Attachment D

2019-20 PHASE I		
Number of Offenders	3,032	Jan 2020 21 institutions: ASP, CCWF, CHCF, CMC, CMF, COR, CTF, DVI, FSP, KVSP, MCSP, NKSP, PVSP, SAC, SATF, SCC, SOL, SQ, SVSP, VSP, WSP
Offender Treatments per Hour	8	Average offenders treated based on current operations
Contracted Hours per Work Day	6	Hours per Work Day based on current operations
Offenders Treated per Work Day	48	8 treatments per hour * 6 hours
Work Days per Round of Treatment	63	48 offenders treated per Work Day to treat approx. 3,032
Annual Treatments per Offender	3	Roll-out in Jan 2020, allowing for 6 months of service
Weeks between Treatments per Offender	8	Time between treatments based on current operations
Total Weeks for 3 Annual Treatments per Offender	24	Service timeline of 6 months equates to 26 weeks
Potential Costs for Mobile Unit Services		
Minimum Cost for Treatment per Work Day (4 hrs)	\$4,000	Minimum treatment time is flat rate (4 hours)
Additional Hours (2 hrs)	\$500	\$250 per each additional hour (2 hours)
Daily Cost per Work Day	\$4,500	Work Day is 6 hours
Total Cost for Work Days per Round of Treatment	\$284,250.00	Work Days per Round of Treatment * Daily Cost per Work Day
Cost per Offender per Treatment	\$93.75	Total Cost for Work Days/Number of Offenders
Total Cost per Offender for 3 Annual Treatments	\$281.25	Cost per Offender * Annual Treatments (3)
Potential Costs for Custody Coverage		
Daily Event Posts per Round of Treatment	63	Work Days per Round of Treatment at 1 Event Post per day
Overtime Hours per Event Post	8	6 hour contractor work day plus 2 hours process in/out
Overtime Hours per Round of Treatment	505	Daily Event Posts * 8 Overtime Hours each Event Post
Total Daily Event Posts for 3 Annual Treatments	190	Daily Event Posts * 3 Annual Treatments
Total Overtime Hours for 3 Annual Treatments	1,516	Overtime Hours * 3 Annual treatments
Average Officer Overtime Pay per Hour	\$60.78	Based on current BMB costing
Total Officer Overtime Pay for 3 Annual Treatments	\$92,142.48	Total Overtime Hours * \$60.78 per hour
Potential Total Costs for Quantity of Offender and Mobile Unit Services (2 Year Contract)		
Estimated Total Cost for All Offender Standard Services	\$852,750.00	Projected for new contract; based on current operations.
Administrative and Education Services	\$56,850.00	Contractor services to brief, sign-up, document offenders, and treatment progress. Cost is \$300 for 2 hrs each session.
Estimated Total Cost for Custody Coverage	\$92,142.48	Projected for Officer Overtime hours to provide escorts and supervision at each treatment.
Estimated Total Cost for Staff Services Manager I (Spec)	\$96,423.75	Additional PY for statewide development, administration, monitoring, and reporting of program, budget, and contract.
Estimated Total Annual Cost for All Services & Coverage	\$1,098,166.23	Standard, Admin & Educ services, Custody coverage, and SSMI

**California Department of Corrections and Rehabilitation
Budget Change Proposal - Tattoo Removal Program
Tattoo Removal Program Estimated Costing**

Attachment D

2020-21 PHASE I		
Offenders	3,032	July 2020 21 institutions: ASP, CCWF, CHCF, CMC, CMF, COR, CTF, DVI, FSP, KVSP, MCSP, NKSP, PVSP, SAC, SATF, SCC, SOL, SQ, SVSP, VSP, WSP
Offender Treatments per Hour	8	Average offenders treated based on current operations
Contracted Hours per Work Day	6	Hours per Work Day based on current operations
Offenders Treated per Work Day	48	8 treatments per hour * 6 hours
Work Days per Round of Treatment	63	48 offenders treated per Work Day to treat approx. 3,032
Annual Treatments per Offender	6	Remaining 3 treatments to complete 6 treatments in Phase I
Weeks between Treatments per Offender	8	Time between treatments based on current operations
Total Weeks for Annual Treatments per Offender	48	Service timeline of 12 months equates to 52 weeks
Potential Costs for Mobile Unit Services		
Minimum Cost for Treatment per Work Day (4 hrs)	\$4,000	Minimum treatment time is flat rate (4 hours)
Additional Hours (2 hrs)	\$500	\$250 per each additional hour (2 hours)
Daily Cost per Work Day	\$4,500	Work Day is 6 hours
Total Cost for Work Days per Round of Treatment	\$284,250.00	Work Days per Round of Treatment * Daily Cost per Work Day
Cost per Offender per Treatment	\$93.75	Total Cost for Work Days/Offenders
Total Cost per Offender for 6 Annual Treatments	\$562.50	Cost per Offender * Annual Treatments (6)
Potential Costs for Custody Coverage		
Daily Event Posts per Round of Treatment	63	Work Days per Round of Treatment at 1 Event Post per day
Overtime Hours per Event Post	8	6 hour contractor work day plus 2 hours process in/out
Overtime Hours per Round of Treatment	505	Daily Event Posts * 8 Overtime Hours each Event Post
Total Daily Event Posts for 6 Annual Treatments	379	Daily Event Posts * 6 Annual Treatments
Total Overtime Hours for 6 Annual Treatments	3,032	Overtime Hours * 6 Annual treatments
Average Officer Overtime Pay per Hour	\$60.78	Based on current BMB costing
Total Officer Overtime Pay for 6 Annual Treatments	\$184,284.96	Total Overtime Hours * \$60.78 per hour
Potential Total Costs for Quantity of Offender and Mobile Unit Services (2 Year Contract)		
Estimated Total Cost for All Offender Standard Services	\$1,705,500.00	Projected for new contract; based on current operations.
Administrative and Education Services	\$113,700.00	Contractor services to brief, sign-up, document offenders, and treatment progress. Cost is \$300 for 2 hrs each session.
Estimated Total Cost for Custody Coverage	\$184,284.96	Projected for Officer Overtime hours to provide escorts and supervision at each treatment.
Estimated Total Cost for Staff Services Manager I (Spec)	\$128,565.00	Additional PY for statewide development, administration, monitoring, and reporting of program, budget, and contract.
Estimated Total Annual Cost for All Services & Coverage	\$2,132,049.96	Standard, Admin & Educ services, Custody coverage, and SSMI